

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF
NEW YORK; STATE OF HAWAI'I; STATE
OF ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
CONNECTICUT; STATE OF DELAWARE;
STATE OF ILLINOIS; STATE OF MAINE;
STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS;
PEOPLE OF THE STATE OF MICHIGAN;
STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE
OF NEW MEXICO; STATE OF OREGON;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; INSTITUTE OF
MUSEUM AND LIBRARY SERVICES;
KEITH E. SONDERLING, in his official
capacity as Acting Director of the Institute of
Museum and Library Services; MINORITY
BUSINESS AND DEVELOPMENT AGENCY;
MADIHA D. LATIF, in her official capacity as
Deputy Under Secretary of Commerce for
Minority Business Development; HOWARD
LUTNICK, in his official capacity as Secretary
of Commerce; FEDERAL MEDIATION AND
CONCILIATION SERVICE; GREGORY
GOLDSTEIN, in his official capacity as Acting
Director of the Federal Mediation and
Conciliation Service; OFFICE OF
MANAGEMENT AND BUDGET; RUSSELL
T. VOUGHT, in his official capacity as Director
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

STIPULATION

NOW COME the Plaintiffs and the Defendants in the above-captioned action (collectively the “Parties”) and hereby agree, stipulate, and propose to the Court for its approval the following:

1. The Plaintiffs’ pending Motion for a Temporary Restraining Order (ECF 3) shall be converted to a Motion for a Preliminary Injunction;
2. The Defendants shall file any response to the Plaintiffs’ Motion (ECF 3) on or before Monday, April 14, 2025;
3. The Plaintiffs shall file any reply to the Defendants’ response to the Plaintiffs’ Motion (ECF 3) on or before Wednesday, April 16, 2025;
4. The Parties request an in-person hearing; and
5. The Parties request that the Court set a hearing on the converted Motion for a Preliminary Injunction as early as the Court can accommodate on or after Thursday, April 17, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 9th day of April, 2025, I electronically filed and served the within document through the ECF filing system. The document is available for viewing and/or downloading from the ECF System.

/s/ Natalya A. Buckler